

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

-----X	
NATIONAL LIGHTING COMPANY, INC. a New	:
Jersey Corporation,	:
	:
Plaintiff,	:
	:
v.	:
	:
BRIDGE METAL INDUSTRIES, LLC, a New York	:
Limited Liability Company; JOSEPH MESSA, an	:
individual; GALAXY SWITCHGEAR INDUSTRIES,	:
LLC, a New York Limited Liability Company;	:
BLAISE FREDELLA, an individual; ISAK	:
LEMBERG, an individual; BORIS BREGMAN, an	:
individual; PICASSO LIGHTING INDUSTRIES	:
LLC, a New York Limited Liability Company;	:
INDEPENDENT LIGHTING, LLC, a New York	:
Limited Liability Company; GREEN LIGHT	:
SOLUTIONS, LLC; and MITCHELL	:
BLOOMBERG, an individual,	:
	:
Defendants.	:
-----X	

Case No. 08 CV 03150

**NOTICE OF MOTION  
TO DISMISS  
THE COMPLAINT**

**PLEASE TAKE NOTICE**, that upon the Affidavit of David B. Rosenberg, duly sworn to on July 18, 2008, and the exhibits annexed thereto, and upon the accompanying Memorandum of Law in Support of Motion to Dismiss the First Amended Complaint (the "Amended Complaint,") and all pleadings and proceedings heretofore had herein, Defendants Galaxy Switchgear Industries, LLC, Isak Lamberg (sued herein as Isak Lemberg), Boris Bregman, Picasso Lighting Industries LLC, Green Light Solutions, LLC, formerly known as Independent Lighting LLC and Mitchell Bloomberg (collectively, the "Moving Defendants") shall make a motion before the Honorable Naomi R. Buchwald, United States District Judge, at the United States District Court, 500 Pearl Street, New York, New York 10007, for an order: a) pursuant to

Rule 12(b)(6) of the Federal Rules of Civil Procedure, dismissing the First, Second, Third, Fourth, Fifth, Sixth, Seventh, Eighth, Ninth, Eleventh and Fourteenth Claims in the Amended Complaint with prejudice and b) pursuant to the Section 1312 of the New York Business Law, dismissing the Tenth, Twelfth and Thirteenth Claims, and c) granting such other and further relief as the Court deems just and proper.

**PLEASE TAKE FURTHER NOTICE**, that pursuant to the stipulated briefing schedule, which was approved by the Court, opposing papers, if any, shall be served on or before August 18, 2008.

Dated: New York, New York  
July 18, 2008

TODD & LEVI, LLP

By: 

Jill Levi (JL 5223)

Attorneys for Moving Defendants  
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